

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Andre D. Taylor, Jr.

Case No.

Case: 2:20-mj-30189
Assigned To : Unassigned

Assign. Date : 6/4/2020

Description: RE: SEALED MATTER
(EOB)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 2020 through the present in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. 1708	Mail Theft
18 U.S.C. 1343	Wire Fraud
18 U.S.C. 1028A	Aggravated Identity Theft

This criminal complaint is based on these facts:

See Attached Affidavit

Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: June 4, 2020

City and state: Detroit, MI



Complainant's signature

Inspector Erin B. Leipold

Printed name and title



Judge's signature

David R. Grand

Printed name and title

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN

IN THE MATTER OF:

ANDRE D. TAYLOR JR

DATE OF BIRTH AUGUST 29, 1993

Case No. _____

Filed Under Seal

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Erin B. Leipold, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Postal Inspector with the United States Postal Inspection Service (USPIS), and have been so employed since January 2008. As part of my duties as a U.S. Postal Inspector, I conduct investigations of offenses involving mail theft, identity theft, access device fraud, and other financial crimes. I have worked this investigation in conjunction with United States Postal Service, Office of the Inspector General (USPS-OIG), Lathrup Village Police Department, and the Michigan State Police (MSP). This affidavit is based on my personal knowledge as well as information obtained from documents, electronic databases, witnesses, and other law enforcement agents involved in this investigation. The information contained in this affidavit is provided for the purpose of establishing probable

cause for a criminal complaint, and thus, it does not contain all the details of the case known to me.

2. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and does not set forth all of my knowledge about this matter.

3. Based on the facts set forth in this affidavit, there is probable cause to believe that violations of Mail Theft, in violation of 18 U.S.C. § 1708, Aggravated Identity Theft, in violation of 18 U.S.C. § 1028A, and Wire Fraud, in violation of 18 U.S.C § 1343 have been committed by Andre TAYLOR JR.

4. Pursuant to search warrants 2:20-mc-50434 and 2:20-mc-50434-2, previous investigation has determined suspect Andre TAYLOR JR uses a cellular telephone connected to the phone number (248) 704-0991 to facilitate a mail theft and identity theft scheme.

PROBABLE CAUSE

5. Affiant has been monitoring the location information relative to the cellular telephone assigned call number (248) 704-0991. On April 30, 2020, Affiant received information that this cellular phone was located near a Meijer at the intersection of 12 Mile Road and Evergreen Road in Southfield, Michigan, at

approximately 3:03 PM. Investigating agents contacted a Meijer Financial Crimes Investigations representative to determine if Andre TAYLOR JR visited this Meijer location on this date and time, and obtain information relative to transactions he may have conducted. Surveillance and transaction records obtained from Meijer confirmed that at or about 3:09 PM TAYLOR JR purchased a \$200 gift card at Meijer #231 using a Meijer credit card ending in 1604, which belongs to K.P. TAYLOR JR and a black Dodge Challenger were seen in surveillance footage obtained from this location.

6. Affiant conducted research in investigative databases and learned K.P. resides in Waterford, Michigan. Information obtained by USPS-OIG indicates the address where K.P. resides is in a mail delivery area handled by the Waterford Carrier Annex, and it is assigned to Route 43.

7. Affiant contacted an investigator working for Citi Investigations regarding the Meijer credit card TAYLOR JR used at the Meijer transaction on April 30, 2020, mentioned in paragraph five. Their records indicate new Meijer credit cards, including one ending in 1604, connected to an account belonging to K.P. were mailed on April 13, 2020, and April 14, 2020.

8. Affiant contacted K.P. via telephone to inquire about the use of her Meijer credit card at Meijer in Southfield on April 30, 2020. K.P. advised that she had received a call from the credit card company regarding transactions on her

Meijer credit card at Meijer locations in Southfield and Royal Oak. K.P. stated she did not authorize these transactions and she has no knowledge of anyone named Andre TAYLOR JR.

9. Affiant contacted Citi Investigations and confirmed that the transaction TAYLOR JR conducted on April 30, 2020, using the Meijer credit card belonging to K.P. would have caused an interstate transmission by wire communication. None of Citi's servers handling these wire communication transmissions are located in Michigan.

10. Previous investigation found that TAYLOR JR used an American Express credit card belonging to K.G. of Waterford, Michigan, on April 7, 2020, to purchase a gift card at Kroger in Farmington Hills, Michigan. American Express confirmed this was a fraudulent transaction and they suffered a loss of \$861 as a result. The address where K.G. resides is also in a mail delivery area handled by the Waterford Carrier Annex, however, this address is located on Route 5.

11. Recently several customer complaints have been received by the USPIS and USPS-OIG from internal and external sources, related to credit cards that were never received by postal customers. These customers also reported learning of fraudulent charges made using the stolen credit cards. These complaints were made by postal customers in the Waterford, Michigan, area who

lived at residential addresses primarily located on Route 5, which is serviced by the Waterford Carrier Annex.

12. One of these complaints was made by R.K., who reported he never received his Bank of America ATM card ending in 5674, which he was expecting to receive via the U.S. Mail. On May 13, 2020, R.K. received a text message from Bank of America regarding a transaction attempted using a new ATM card at Meijer #231 in Southfield, Michigan, in the amount of \$312.90.

13. Investigating agents contacted a Meijer Financial Crimes Investigations representative to obtain information relative to the attempted transaction using R.K.'s Bank of America ATM card on May 13, 2020. Surveillance and transaction records obtained from Meijer confirmed that at or about 2:58 PM on May 13, 2020, TAYLOR JR attempted to purchase a \$200 gift card at Meijer #231 using a credit card ending in 5674. TAYLOR JR and a black Dodge Challenger were seen in surveillance footage obtained from this location.

14. Another complaint was received from E.B. on or about May 15, 2020. He reported he and his neighbors never received Capital One credit cards that were mailed to them. E.B. reported his Capital One credit card had been activated and there were fraudulent charges made using it. Affiant contacted E.B. regarding his complaint and was informed that the compromised credit card had been mailed to him in mid-March 2020. E.B. stated there were three ATM cash advances using

the card. E.B. reported the situation to the Waterford Police Department and learned a similar report had been made to them by someone living nearby.

15. Affiant contacted an investigator employed by Capital One regarding recent thefts of credit card mailings in the Waterford, Michigan area. Their records indicate numerous credit cards have been stolen from Capital One customers living in this area between February 2020 and April 2020. The phone number (248) 845-0624 contacted Capital One to activate most of these credit cards. The Capital One customers who were expecting delivery of these credit cards via U.S. Mail live at addresses which are primarily located on either Route 43 or Route 5 in the mail delivery territory of the Waterford Carrier Annex.

16. USPS-OIG contacted management at the Waterford Carrier Annex to obtain information relative to the letter carrier assigned to Route 5. They advised City Carrier Assistant (CCA) J.M. has been assigned to this route since approximately March 24, 2020. Prior to this time, J.M. was assigned to Route 43. Management also advised J.M.'s personal vehicle is a black Ford Fusion bearing Florida license plate IGH R81.

17. On May 20, 2020, Affiant provided information regarding J.M. to D/Trooper DePeel, assigned to the Michigan State Police surveillance team following TAYLOR JR. DePeel advised members of his team witnessed TAYLOR JR meeting with J.M. behind a White Castle located near Greenfield

Road and 8 Mile Road on May 13, 2020. TAYLOR JR exited his vehicle and entered the passenger side of J.M.’s Ford Fusion, where he sat for 3 to 4 minutes. TAYLOR JR then exited J.M.’s vehicle and left the area.

18. Recently USPS-OIG has received a complaint from J.B., a resident of Waterford, Michigan, whose address is located on Route 5, serviced by the Waterford Carrier Annex. J.B. reported receiving notification via Informed Delivery, an electronic service offered by the USPS, on May 11, 2020, regarding the impending delivery of her unemployment benefits card. J.B. never received this benefits card in her mail. J.B. ordered another benefits card and received notification via Informed Delivery on May 22, 2020, regarding the impending delivery of this benefits card. J.B. reported she did not receive this benefits card either.

19. On May 27, 2020, USPS-OIG conducted an undercover “test” of J.M. by monitoring the delivery of an American Express credit card mailing to an address on her delivery route, Route 5. J.M.’s activities were observed by USPS-OIG agents, who determined that J.M. did not deliver the credit card mailing to the intended address. J.M.’s USPS delivery vehicle was later searched by USPS-OIG agents, who found the credit card mailing in personal sorting container she kept in the vehicle.

20. Affiant and Special Agent Patrick Fox, USPS-OIG, interviewed J.M. at the Waterford Carrier Annex. J.M. initially denied she was stealing credit cards from the U.S. Mail and also denied she was providing these stolen credit cards to anyone else. However, J.M. later admitted that she entered into an agreement with a man to steal credit card mailings from her mail route. J.M. stated she is currently assigned to Route 5 and was previously assigned to Route 43, and she stole credit cards from both routes. She maintained she does not know the name of the man she is working for, but identified him as Andre TAYLOR JR after viewing a photo line-up. J.M. volunteered that TAYLOR JR's birthday is at the end of August and that he is a Virgo (these statements are accurate). J.M. stated she had been stealing credit card mailings since approximately January 2020, and he paid her \$75 for each credit card. J.M. estimated she had stolen 100 credit cards in total. J.M. stated she was "probably" going to steal the American Express credit card USPS-OIG agents used as a test on her route that day for TAYLOR JR. J.M. advised she oftentimes meets up with him at a White Castle parking lot in Detroit. When asked about the vehicle TAYLOR JR drives, she stated unprompted that he always drives a newer black Dodge Challenger with black rims and tinted windows. J.M. confirmed she communicates with this man via the Telegram app and allowed agents to view the messages between them in the app. Affiant observed several images of credit card mailings, and noticed there were images of mailings

containing unemployment benefits cards. J.M. advised that TAYLOR JR had recently been interested in obtaining unemployment benefit cards mailed to addresses on J.M.'s mail route. Affiant viewed several messages which confirmed this statement. J.M. told agents that she knew TAYLOR JR had postal employees working for him in Birmingham, Troy, several Detroit post offices, and post offices located out of state.

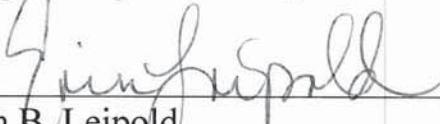
21. On May 21, 2020, Affiant reviewed mail staged for delivery to 27157 Gateway Drive W Apt 108, Farmington Hills, Michigan 48334, which included a mailing from the State of Michigan Unemployment Insurance Agency (MUIA) addressed to S.A. Affiant contacted Regulation Agent Eggly, an investigative resource working for the MUIA, regarding this mailing. Eggly confirmed a claim for unemployment benefits had been made using the name S.A. and the address 27157 Gateway Drive W Apt 108, Farmington Hills, Michigan 48334 on May 14, 2020, via the internet.

22. Using investigative resources, Affiant located S.A. and contacted him via telephone. S.A. advised he is a resident of Berkley, Michigan, and he had not made a recent claim for unemployment benefits through the State of Michigan. S.A. advised he previously lived at 27157 Gateway Drive W in Farmington Hills, until approximately April 2018.

23. Investigating agents have identified 27157 Gateway Boulevard Drive W Apt 108 in Farmington Hills as the residence of Andre TAYLOR JR, and his vehicle as a black 2019 Dodge Challenger bearing Michigan license plate EBK 9402.

24. Based on the totality of the facts and circumstances described above, along with Affiant's training and experience, probable cause exists to believe that TAYLOR JR has committed violations of federal criminal laws, specifically, 18 U.S.C. § 1708 (Theft of Mail), 18 U.S.C. § 1028A (Aggravated Identity Theft), and 18 U.S.C. § 1343 (Wire Fraud).

Respectfully submitted,



Erin B. Leipold
U.S. Postal Inspector
U.S. Postal Inspection Service

Sworn to before me and signed in my presence
and/or by reliable electronic means.



DAVID R. GRAND
UNITED STATES MAGISTRATE JUDGE

June 4, 2020